

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. 394**

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS MOTION OF DEBTORS  
SEEKING ENTRY OF AN ORDER (I) AUTHORIZING (A) REJECTION OF CERTAIN  
EXECUTORY CONTRACTS AND UNEXPIRED LEASES EFFECTIVE AS OF DATES  
SPECIFIED HEREIN AND (B) ABANDONMENT OF CERTAIN PERSONAL  
PROPERTY, IF ANY, AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies that:

1. On August 31, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Omnibus Motion of Debtors Seeking Entry of an Order (I) Authorizing (A) Rejection of Certain Executory Contracts and Unexpired Leases Effective as of Dates Specified Herein and (B) Abandonment of Certain Personal Property, If Any, and ((II) Granting Related Relief* (the “Motion”) [Docket No. 394].

2. The deadline to respond to the Motion was on September 8, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The Debtors received informal comments from (a) the Office of the United States Trustee and (b) Schneider, and a filed objection from (c) East West Bank [Docket No. 430] (the “Responding Parties”).

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

4. The Debtors circulated a revised proposal form of order to the Responding Parties and the following parties: counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, the United States Department of the Treasury, and the UST Tranche A Agent and UST Tranche B Agent (collectively, with the Responding Parties, the “Reviewing Parties”).

5. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the Revised Proposed Order. Attached hereto as Exhibit B is a redline of the Revised Proposed Order showing changes against the order filed with the Motion.

6. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order at the Court’s earliest convenience.

Dated: September 13, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)

Timothy P. Cairns (DE Bar No. 4228)

Peter J. Keane (DE Bar No. 5503)

Edward Corma (DE Bar No. 6718)

**PACHULSKI STANG ZIEHL & JONES LLP**

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, Delaware 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: ljones@pszjlaw.com

tcairns@pszjlaw.com

pkeane@pszjlaw.com

ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted *pro hac vice*)

David Seligman, P.C. (admitted *pro hac vice*)

Whitney Fogelberg (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

300 North LaSalle

Chicago, Illinois 60654

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: patrick.nash@kirkland.com

david.seligman@kirkland.com

whitney.fogelberg@kirkland.com

-and-

Allyson B. Smith (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: allyson.smith@kirkland.com

*Proposed Co-Counsel for the Debtors and Debtors in*